

Monica Lindeman/R10/USEPA/US

03/29/2007 08:38 AM

To: Randy Hippen/DC/USEPA/US  
Cc: Monica Tonel/R10/USEPA/US@EPA, Earl Liverman/R10/USEPA/US@EPA,  
Lynne Kershner/R10/USEPA/US@EPA,  
Morris Lance/R10/USEPA/US@EPA, Craig Conant/R10/USEPA/US@EPA  
Subject: Non-NPL Status: Removal Only Site - Re: IDD984666313 Avery Railroad Dump and Roundhouse

Hi, Randy,

Thanks for your answers to our questions.

- In view of your comments and the prior Non-NPL status of the site, Monica Tonel and I have determined that now the Non-NPL Status of **Removal Only Site (No Site Assessment Work Needed)** is the appropriate one for the **IDD984666313 Avery site**. The reason is that the last time Site Assessment was involved, it was at the completion of an SI with a NFRAP determination and archive action in 1993. When in December 2006 new information was received by EPA that warranted further evaluation, the site was not an active site assessment site and the information came directly to Removal. Therefore, it is not a Site Assessment referral.

- In reference to your comments on Question #3, here is our response. R.10 does the following:

IF Removal sites that have been prior Site Assessment sites and are **NOT ACTIVE** Site Assessment sites (NFRAPd and inactive/archive status), or are solely identified as removal action sites, then we assign a Non-NPL status of **"Removal Only Site"**.

IF Removal sites that have been prior Site Assessment sites and are **STILL ACTIVE** Site Assessment sites, where it has been determined that a next step should be a removal action, then we refer the site to Removal and assign, on a site by site basis, either a Non-NPL status of **"Referred to Removal - Further Assessment Needed"** or **"Referred to Removal - NFRAP"**.

Any further thoughts?

Thanks much!

Monica.

Randy Hippen/DC/USEPA/US

03/27/2007 11:17 AM

To: Monica Lindeman/R10/USEPA/US@EPA  
Cc: Monica Tonel/R10/USEPA/US@EPA  
Subject: Re: IDD984666313 Avery Railroad Dump and Roundhouse - Non-NPL Status after Unarchive for forthcoming Removal Assessment?

answers are below..



**Monica Lindeman/R10/USEPA/US**

03/27/2007 01:47 PM

To Randy Hippen/DC/USEPA/US@EPA  
Cc Monica Toner/R10/USEPA/US@EPA  
Subject IDD984666313 Avery Railroad Dump and Roundhouse - Non-NPL Status after Unarchive for forthcoming Removal Assessment?

Hi, Randy - Tried to clarify our thinking re the Non-NPL status of the IDD984666313 Avery Railroad Dump and Roundhouse site subsequent to a forthcoming Unarchive and Removal Assessment by the Removal crew:

**Question # 1:** Does R.10 Site Assessment lose the site out of its total site assessment sites inventory, if the site is reactivated with a Non-NPL status of:

Removal Only Site (No Site Assess Work Needed)?

No. As long as the site has a completed site discovery action, it should remain in the site assessment inventory.

**Question # 2:** Removal will do a Removal Assessment first, before any potential Removal, does the above Non-NPL status pertain or should the Non-NPL status be, it does not say "Site Assessment" or "Removal Assessment":

Referred to Removal - Further Assessment needed?

Removal Only applies. As I recall, the term is intended to indicate the removal program currently has an interest at a site and the site assessment program currently does not. So it wouldn't matter if it was a removal assessment or removal action.

**Question #3:** The site was NFRAPd in 1993 and will now be reactivated, therefore should the Non-NPL status be:

Referred to Removal - NFRAP?

I think this is more accurate than removal-only since it included the NFRAP term. However, I'm starting to question whether there are any non-NPL = removal-only sites with a completed site discovery that did not have a NFRAP status at one point (either last action qualifier or non-NPL status). If that is true, it might be better to use a non-NPL status value of removal-only for sites that do not have a completed site discovery action and use a non-NPL status value of Referred to Removal-NFRAP for those that do. Can you please let me know what you think about this.

**AND**

Regardless of the above Non-NPL Status chosen, we plan to enter two actions:

Unarchive & date

Removal Assessment & Planned Action Date/Planned Action Completion Date

That's fine.

What do you think?

Thanks!

Monica.  
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